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IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

SHANE MICHAEL TROUT

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Criminal No. 21-32 Erie

(16 U.S.C. §§ 3372(a)(2)(B), 3373(d)(1)(B),
3373(d)(2) and 3373(d)(3)(A)(ii))

FILED

INDICTMENT

AUG 17 2021

COUNT ONE

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

The grand jury charges:

On or about November 4, 2019 in McKean County, in the Western District of Pennsylvania, SHANE MICHAEL TROUT, did knowingly receive, acquire, and purchase plants with a market value in excess of \$350.00, that is, wild American ginseng (*Panax quinquefolius*), in interstate commerce knowing that said plants were transported into Pennsylvania from Ohio in violation of and in a manner unlawful under the laws and regulations of the state of Ohio that protect American ginseng, specifically Ohio Administrative Code, Chapter 1501:31-40(A) that requires a state certification be issued for all Ohio ginseng collected or grown in Ohio and being exported from the state.

In violation of Title 16, United States Code, Sections 3372(a)(2)(B) and 3373(d)(1)(B).

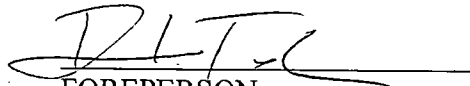
COUNT TWO

The grand jury further charges:

On or about January 14, 2020 in McKean County, in the Western District of Pennsylvania, SHANE MICHAEL TROUT, did knowingly and unlawfully make or submit a false record for a plant with a market value in excess of \$350.00, that is, wild American ginseng (*Panax quinquefolius*), which was intended to be transported in interstate or foreign commerce in that the defendant, SHANE MICHAEL TROUT, did make and submit a false Ginseng Dealer Quarterly Report to the Commonwealth of Pennsylvania, Department of Conservation and Natural Resources, Bureau of Forestry that reported purchased ginseng as having been harvested within specified counties in Pennsylvania when, in reality, these quantities of ginseng had been harvested in Ohio and illegally imported into Pennsylvania without the required import certificates.

In violation of Title 16, United States Code, Sections 3372(d)(2) and 3373(d)(3)(A)(ii).

A True Bill,


FOREPERSON


STEPHEN R. KAUFMAN
Acting United States Attorney
PA ID No. 42108